

City of
Bellevue



Post Office Box 90012 • Bellevue, Washington • 98009-9012

The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

FILED/ACCEPTED
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AUG - 9 2011
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Federal Communications Commission
Office of the Secretary

Re: LightSquared Subsidiary LLC Request for Modification of its authority for an
Ancillary Terrestrial Component, File No. SAT-MOD-20101118-00239

Dear Mr. Chairman:

I write to express our concern over LightSquared Subsidiary LLC's plans to install 40,000 high-power broadband transmission towers across the United States and the devastating effect it will have on our daily operations. We fully support and actively seek ways to enable increased wireless bandwidth for our citizens, but this must not be done at the expense of our Precision GPS capability. We wish to enter our vote in support of moving the LightSquared planned terrestrial system out of the frequencies traditionally reserved for space based communication.

The City of Bellevue first purchased four Precision Global Positioning System (GPS) receivers in 1990. While survey grade GPS was very expensive at that time, it enabled us to complete in less than one year a project that would have taken us more than ten years using traditional survey methods. GPS enabled us for the first time to have all of our planning, engineering, construction and operational data referenced to a single unified coordinate system.

In the intervening 21 years GPS has saved us many millions of dollars and has enabled systems and processes that would be impossible to maintain without it. We currently operate three GPS Continuously Operating Reference Stations that support both city and private sector activities. Survey, mapping and navigation grade GPS is imbedded in all of our planning, engineering, construction, maintenance, fleet and public safety operations.

Technically speaking, with our city at a more northerly latitude and having extensive tree cover, we often find ourselves at the margin of GPS operational capabilities. Any degradation of GPS signal reception will severely impact its functionality and greatly impact our operations.

Sincerely,

Nora Johnson, Director
Civic Services Department

CC: Brad Miyake, Deputy City Manager
Diane Carlson, Director of Intergovernmental Relations